



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

July 19, 1996

KLEIN TOOLS INC
ATTN: JAMES BREISCH
7200 MCCORMICK
SKOKIE, IL 60076

RE: US EPA ID Number ILD 005 149 141
Location: 7200 MCCORMICK
SKOKIE, IL 60076

In response to your correspondence of 05/1796, the following
information has been updated:

LEGAL OWNER'S ADDRESS:	7200 MCCORMICK
LEGAL OWNER'S PHONE NUMBER:	(847) 677-9500
GENERATOR STATUS CHANGED TO:	LARGE QUANTITY GENERATOR
ADDITION OF WASTE CODE(S):	D001

If you have any questions, please call me at (312) 886-6173.

Sincerely,

A handwritten signature in cursive script that reads "Sharon Kiddon".

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File

RECEIVED
WMD RECORD CENTER

AUG 16 1996

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

JUN 15 1996

OFFICE

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

ILD005149141

II. Name of Installation (Include company and specific site name) 0316005491

KLEIN TOOLS INC.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

7200 MCCORMICK

Street (continued)

City or Town

SKOKIE

State

ZIP Code

IL 60076-

County Code County Name

031 COOK

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

7200 MCCORMICK

City or Town

SKOKIE

State

ZIP Code

IL 60076-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

BREISCH

(first)

JAMES

Job Title

MGR IND. ENG.

Phone Number (area code and number)

847-677-9500

VI. Installation Contact Address (See instructions)

A. Contact Address
Location Mailing☐☐

B. Street or P.O. Box

7200 MCCORMICK

City or Town

SKOKIE

State

ZIP Code

IL 60076-

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

CORPORATION

Street, P.O. Box, or Route Number

7200 MCCORMICK

City or Town

SKOKIE

State

ZIP Code

IL 60076-

Phone Number (area code and number)

847-677-9500

B. Land Type

☐

C. Owner Type

☐D. Change of Owner
Indicator☐(Date Changed)
Month Day Year☐☐☐☐☐☐☐

RCRISENTRY JUN 21 1996



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

TO: CAROLIN LEWIS DATE: 05-29-96
FROM THE DESK OF: JIM PIERCE IEPA

RE: KLEIN TOOLS INC

- ☐ FOR YOUR APPROVAL
- ☐ TAKE NECESSARY ACTION
- ☐ APPROVED
- ☐ REPLY REQUESTED
- ☐ FOR YOUR COMMENTS

- ☐ FOR YOUR INFORMATION
- ☐ PER YOUR REQUEST
- ☐ SEE ME ABOUT ATTACHED
- ☐ PLEASE RETURN
- ☐ PLEASE CALL ME

COMMENTS:

I TALKED WITH JAMES
BREISCH TODAY, AND HE
TELLS ME THAT 7200 McCORMICK
IS IN SKOKIE AND NOT
CHICAGO, AS THE FEDERAL
PRINT OUT HAS IT.
Their mailing address is
CHICAGO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

Attn: James Breisch, Manager
Klein Tools Inc
7200 McCormick Road
Chicago, IL 60645

REPLY TO THE ATTENTION OF:

RCRA ACTIVITIES

24 MAR 1987

RE: EPA ID #: ILD 005149141

In response to your request of February 2, 1987 the following information
has been updated:

Please see attached Notification,
highlighted areas.

If you have any questions, please contact Sharon Kiddle at (312) 886-6173

Sincerely,

Arthur S. Kawatachi
Information Unit
Program Management Section

cc: State Agency
File

87.5423

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).



Notification of Hazardous Waste

For Official Use Only

Comments

[illegible]

I. Name of Installation

[illegible]

II. Installation Mailing Address									
----------------------------------	--	--	--	--	--	--	--	--	--

Street or P.O. Box

[illegible]

City or Town

State

ZIP Code

[illegible]

III. Location of Installation

Street or Route Number

[illegible]

City or Town

State

ZIP Code

[illegible]

IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

C	B	R	E	I	S	C	H		J	A	M	E	S		M	G	R			3	1	2	6	7	7	9	5	0	0
---	---	---	---	---	---	---	---	--	---	---	---	---	---	--	---	---	---	--	--	---	---	---	---	---	---	---	---	---	---

V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C	K	L	E	I	N	T	O	O	L	S	I	N	C	P
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

- ☒ 1a. Generator ☒ 1b. Less than 1,000 kg/mo.
- ☐ 2. Transporter
- ☐ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel
(enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner

- ☐ 6. Off-Specification Used Oil Fuel
(enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer (or On Site Burner)
Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

- ☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

- ☐
- A. Air
- ☐
- B. Rail
- ☒
- C. Highway
- ☐
- D. Water
- ☐
- E. Other (specify) _____

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

C. Installation's EPA ID Number

- ☐ A. First Notification ☒ B. Subsequent Notification (*complete item C*)

I	L	D	0	0	5	1	4	9	1	4
---	---	---	---	---	---	---	---	---	---	---

ID — For Official Use Only																	
C																T/A	C
W																	1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
D 0 0 7	D 0 0 2				
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
N/A					
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
N/A					

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable
(D001)

☒ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☐ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Richard T. Klein Jr.

Name and Official Title (type or print)

RICHARD T. KLEIN JR.
V.P. PROCESS ENG.

Date Signed

1-29-87



U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA
I.D. NO.

ILD005149141

NAME OF IN-
STALLATIONII. INSTALLATION
MAILING
ADDRESSKLEIN TOOLS INC
7200 MC CORMICK BLVD
SKOKIE, IL 60076III. LOCATION
OF INSTAL-
LATION7200 MC CORMICK BLVD
SKOKIE, IL 60076

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

000065 AUG 18 80

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER 2 APPROVED A DATE RECEIVED (yr., mo., & day) 800815

I. NAME OF INSTALLATION

KLEIN TOOLS INC.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

7200 N. MCCORMICK RD.

CITY OR TOWN

CHICAGO

ST.

ZIP CODE

IL60645

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

7200 N. MCCORMICK RD.

CITY OR TOWN

CHICAGO

ST.

ZIP CODE

IL60645

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

J. R. GREEN PLANT MANAGER

312-677-9500

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

KLEIN TOOLS INC.

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

M

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

ILD005149141

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 15 1980

W 1 LD00051 4914121
 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F006 23 - 26	2 F007 23 - 26	3 F008 23 - 26	4 F009 23 - 26	5 F010 23 - 26	6 F011 23 - 26
7 F012 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

James R. Green

NAME & OFFICIAL TITLE (type or print)

JAMES. R. GREEN PLANT MANAGER

DATE SIGNED

8/14/80



7200 McCORMICK BLVD.
CHICAGO, ILLINOIS 60645
(312) 677-9500
TELEX 72-4431

May 25, 1984

Illinois Environmental Protection Agency
Division of Land Pollution Control
1701 South First Avenue, Suite 600
Maywood, Illinois 60153

Attn: Mr. Kenneth P. Bechely
Northern Region Manager

Refer To: 03100000 - Cook County - Chicago/Klein Tools
USEPA Hazardous Waste Notification No. ILD005149141 G, TSD

NON-HANDLER INACTIVE I.D. # *sjh*
6/4/84

Dear Mr. Bechely:

I am requesting that Klein Tools, Inc. be deleted from the hazardous waste facility list. On April 13, 1984, the Illinois Environmental Protection Agency conducted an inspection of our facilities and found that we are not presently required to be regulated under 35 ILL. ADM. Code 720 through 725.

Sincerely,

KLEIN TOOLS, INC.

Joe V. Olson
Manager, Industrial Engineering

cc: USEPA - Region V
230 South Dearborn Street
Chicago, Illinois 60604

JVO:pc

RECEIVED

MAY 30 1984

WMD-RAIU
EPA, REGION V

WASTE MANAGEMENT
BRANCH



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

FILE COPY

SEP 28 1982

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

GREEN JR MGR
KLEIN TOOLS INC
7200 N MCCORMICK RD
CHICAGO IL 60645
FACILITY: 7200 N MCCORMICK RD
LOCATION: CHICAGO IL 60645
ID NO.: ILD005149141

RE: TSD Notification without
Part A Application

Dear Notifier:

The United States Environmental Protection Agency (U.S. EPA) has received your notification of hazardous waste activity. On that form, by checking the "treat/store/dispose" (TSD) box, you indicated that you are a hazardous waste management facility (HWMF). To date, however, we have no record of having received Part A application for a hazardous waste permit which is required for all HWMFs.

Federal regulations require owners and operators of existing HWMFs (installations which treat, store, or dispose of hazardous waste) to have submitted a Part A permit application to the Regional Administrator by November 19, 1980, in accordance with 40 CFR 122.22. This requirement applied to HWMFs which were in existence on or before November 19, 1980. New facilities (those established after November 19, 1980) are required to submit Part A and Part B of their permit application, and receive a Resource Conservation and Recovery Act (RCRA) permit before beginning physical construction.

If your facility treats, stores, or disposes of hazardous waste, then your facility is operating without a hazardous waste permit, in violation of Section 3005 of RCRA, as amended. This violation is considered serious by the U.S. EPA, and may subject you to Federal enforcement under Section 3008 of RCRA for past and continued non-compliance.

Please submit your completed Part A application to the address below within fifteen days of receipt of this letter:

RCRA ACTIVITIES
P. O. Box A3587
Chicago, Illinois 60690-3587

We are aware that some hazardous waste handlers may have marked the TSD box on the notification form as a precaution or as a result of misunderstanding the May 19, 1980, hazardous waste regulations. If you notified us as a TSD in error, or if your status as a treatment, storage, or disposal facility has changed, please advise us in writing immediately.

Please contact Arthur Kawatachi of my staff at (312) 353-2197, if you have any questions regarding this letter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

B. Russell
USEPA

217/782-6761

Refer to: 0316005491 -- Cook County
Klein Tools
ILD005149141
Compliance File

COMPLIANCE INQUIRY LETTER

Certified #P 681 207 922

September 18, 1991

Klein Tools
Attn: Michael Serpe
7200 North McCormick Boulevard
Chicago, Illinois 60645

Dear Mr. Serpe:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code, Subtitle S; Part 722, Subparts A through G; and Part 728, Subparts A through E and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations.

The Agency's findings of apparent non-compliance listed in Attachment A are based on an inspection completed on June 5, 1991 by Russ Crittenden of Dynamac Corporation (USEPA Contract #68-M9-U006) with oversight by the Illinois Environmental Protection Agency. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Lizz Schwartzkopf
Compliance Unit
Planning and Reporting Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

RECEIVED

SEP 26 1991

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V.

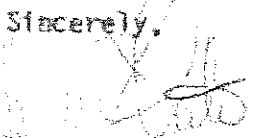


Page 2

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

If you have any questions regarding the above, please contact Cliff Gould at 708/531-5900.

Sincerely,


Brian S. White, Manager
Compliance Unit
Planning and Reporting Section
Division of Land Pollution Control

BSW:JEH:LS:dls/2600q/75-76

cc: Division File
Maywood Region
Cliff Gould
Lizz Schwartzkopf
Barb Russell, USEPA
Rick Hersemann, PRC Environmental Management Inc.



ATTACHMENT A

1. Pursuant to 35 Ill. Adm. Code 722.134(a), except as provided in subsections (d), (e) or (f), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:
 1. The waste is placed in containers and the generator complies with 35 Ill. Adm. Code 725. Subpart I or the waste is placed in tanks and the generator complies with 35 Ill. Adm. Code 725. Subpart J except 35 Ill. Adm. Code 725.297(c) and 725.300. In addition, such a generator is exempt from all the requirements in 35 Ill. Adm. Code 725. Subparts G and H, except for 35 Ill. Adm. Code 725.211 and 725.214;
 2. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
 3. While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste", and
 4. The generator complies with the requirements for owners or operators in 35 Ill. Adm. Code 725 Subparts C (Preparedness and Prevention) and D (Contingency Plan and Emergency Procedures) and with 35 Ill. Adm. Code 725.116 (Personnel Training).

You are in apparent violation of 35 Ill. Adm. Code 722.134(a) in that items 1, 2, 3 and 4 above were not complied with.

Specifically, the requirements of item 1 and/or 4 above (listed by regulation) which were not complied with, as well as the deficiencies observed, are:

- a. Pursuant to 35 Ill. Adm. Code 725.116(a), facility personnel must complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management procedures. The training must be designed to ensure that facility personnel are able to respond to emergencies, and at a minimum meet the applicable requirements of Section 725.116(a)(3). You are in apparent violation of 35 Ill. Adm. Code 725.116(a) for the following reason(s): Facility personnel have not completed the above cited program.
- b. Pursuant to 35 Ill. Adm. Code 725.118(d), the owner or operator must maintain the following documents and records at the facility:
 1. The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;



2. A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education or other qualifications and duties of facility personnel assigned to each position;
3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this Section;
4. Records that document that the training or job experience required under paragraphs (a), (b) and (c) of this Section has been given to and completed by facility personnel.

You are in apparent violation of 35 Ill. Adm. Code 725.116(d) in that item(s) 2 and 3 above were not maintained at the facility.

- c. Pursuant to 35 Ill. Adm. Code 725.116(e), training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. You are in apparent violation of 35 Ill. Adm. Code 725.116(e) for the following reason(s): Training records cited above have not been kept.
- d. Pursuant to 35 Ill. Adm. Code 725.137, the owner or operator must attempt to make arrangements to familiarize local police, fire departments, emergency response teams and hospitals as well as state authorities with the hazardous aspects of the facility. These arrangements are to be included in the contingency plan. You are in apparent violation of 35 Ill. Adm. Code 725.137 for the following reason(s): Your facility has not familiarized local hospitals with the properties of the hazardous wastes you handle.
- e. Pursuant to 35 Ill. Adm. Code 725.152(a), the contingency plan must describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility. You are in apparent violation of 35 Ill. Adm. Code 725.152(a) for the following reason(s): Your Contingency Plan does not describe actions to be taken by personnel in the event of a fire, explosion or release.



- f. Pursuant to 35 Ill. Adm. Code 725.152(c), the contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency services, pursuant to Section 725.137. You are in apparent violation of 35 Ill. Adm. Code 725.152(c) for the following reason(s): Your Contingency Plan does not describe the arrangements made with fire and police departments, local hospitals, and state and local emergency response teams.
- g. Pursuant to 35 Ill. Adm. Code 725.152(e), the contingency plan must include an up-to-date list of all emergency equipment at the facility. The plan must include the location and a physical description of each item and a brief outline of its capabilities. You are in apparent violation of 35 Ill. Adm. Code 725.152(e) for the following reason(s): Your Contingency Plan does not include a list of emergency equipment, together with their locations and capabilities.
- h. Pursuant to 35 Ill. Adm. Code 725.152(f), the contingency plan must include an evacuation plan for facility personnel, if necessary. You are in apparent violation of 35 Ill. Adm. Code 725.152(f) for the following reason(s): Your Contingency Plan does not include an evacuation plan.
- i. Pursuant to 35 Ill. Adm. Code 725.153, a copy of the contingency plan and all revisions to the plan must be:
 - a) Maintained at the facility; and
 - b) Submitted to all local police departments, fire departments, hospitals and state and local emergency response teams that may be called upon to provide emergency services.

You are in apparent violation of 35 Ill. Adm. Code 725.153 in that condition(s) b above was not complied with.
- j. Pursuant to 35 Ill. Adm. Code 725.154, the contingency plan must be reviewed and immediately amended, if necessary, whenever:
 - a. Applicable regulations are revised;
 - b. The plan fails in an emergency;
 - c. The facility changes -- in its design, construction, operation, maintenance or other circumstances -- in a way that materially increases the potential for fires, explosions or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency;



d. The list of emergency coordinators changes;

e. The list of emergency equipment changes.

You are in apparent violation of 35 Ill. Adm. Code 725.154 for the following reason(s): Items a, d, and e above were not complied with.

- k. Pursuant to 35 Ill. Adm. Code 725.274, the owner or operator must inspect areas where containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. You are in apparent violation of 35 Ill. Adm. Code 725.274 for the following reason(s): Your logs of inspection of satellite and container accumulation areas indicate that inspections were not conducted weekly.

LS:dls/2500q/77-80

ILD 005 149 141

COMPLIANCE EVALUATION INSPECTION

**KLEIN TOOLS, INC.
CHICAGO, ILLINOIS**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	R05031
EPA Region	:	5
Site No.	:	ILD 005 14 9141
Date Prepared	:	September 5, 1991
Contract No.	:	68-W9-0006
PRC No.	:	R05031-57
Dynamac No.	:	1368-021
Dynamac Project Manager	:	Joseph Weslock
Telephone No.	:	312/466-0222
Prepared By	:	Dynamac Corporation (Russ Crittenden)
EPA Work Assignment Manager	:	Barbara Russell
Telephone No.	:	312/353-7922

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05031 from the United States Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9). This assignment involves conducting Resource Conservation and Recovery Act (RCRA) compliance evaluation inspections (CEI) in Illinois. PRC in turn directed Dynamac Corporation (Dynamac), its TES 9 team member, to complete 28 of the 90 CEI's assigned under this project. As part of this assignment, Dynamac conducted a CEI at the Klein Tools, Inc. (Klein Tools), facility in Chicago, Illinois.

The objective of the CEI is to determine the facility's compliance with applicable portions of hazardous waste management regulations of the 35 Illinois Administrative Code (35 IAC) and corresponding Federal regulations (40 CFR Parts 261, 262, 265, and 268).

Dynamac met with the Illinois Environmental Protection Agency (IEPA) and conducted a pre-inspection file review on May 14, 1991. IEPA officials provided Dynamac, through PRC, with copies of state and Federal checklists to be completed during the CEI. During the file review, the Dynamac team leader completed the pre-inspection file review form, photocopied relevant documents, and became acquainted with the facility's operation and regulatory history. Dynamac also completed a review of EPA files relating to the facility.

On June 5, 1991, Dynamac conducted an unannounced CEI at Klein Tools. The following personnel were present during the inspection:

o	Michael Serpe	Klein Tools, Industrial Engineer
o	Sandy Ketchum	Klein Tools, Industrial Engineer
o	Russ Crittenden	Dynamac, Inspection Team Leader
o	Darline Terrell	Dynamac, Inspector
o	Jeff Smith	Dynamac, Inspector

Dynamac interviewed facility personnel, reviewed facility records, evaluated facility waste management record keeping, and conducted an inspection of the facility's waste management operations. Dynamac completed the applicable checklists to assist in the compliance evaluation inspection. Dynamac also took four photographs of significant site operations and inspection findings.

This report describes the findings of the inspection and evaluates the facility's regulatory compliance. The completed checklists are provided in Appendix A, and photographs taken during the inspection are included in Appendix B.

2.0 FACILITY BACKGROUND

This section describes the facility's location, operations, and regulatory status.

2.1 FACILITY LOCATION

Klein Tools is located at 7200 McCormick Road, Chicago, Illinois, and occupies a single large building. The present facility has been occupied by Klein tools since 1953. The surrounding area is light industrial and commercial.

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2.2 FACILITY OPERATIONS

Klein Tools manufactures a variety of hand tools such as pliers. Some forging occurs at the facility, but most of the tools are forged in another facility. Principle facility operations include machining, cutting, and finishing. Finishing operations include cleaning with hydrochloric acid, zinc-chrome plating, and "black oxide" coating. Plastic handles are placed on some tools by dipping into melted plastic. There are approximately 300 to 400 employees at Klein Tools working on three shifts. A diagram of the Klein Tools facility layout is provided as Figure 1.

2.3 REGULATORY STATUS AND HISTORY

Klein Tools currently operates as a RCRA large-quantity generator of hazardous waste. According to the "Uniform Hazardous Waste Manifests" and annual reports from 1988, 1989, and 1990, reviewed during the June 1991 inspection, Klein Tools generates approximately sixteen 55-gallon drums (875 gallons) of hazardous waste per month and accumulates this waste on-site for less than 90 days (Klein Tools, 1991).

Klein Tools originally submitted Notification of Hazardous Waste Activity (Notification) (EPA Form 8700-12) on August 14, 1980, as a generator of F006, F007, F008, F009, F010, F011, and F012 wastes and as a storage facility. The facility was inspected by Illinois EPA on April 13, 1984. IEPA determined at that time that Klein Tools should not be regulated under 35 IAC 720 through 725 (IEPA, 1984). Klein Tools subsequently requested that their notification be withdrawn (Klein Tools, 1984).

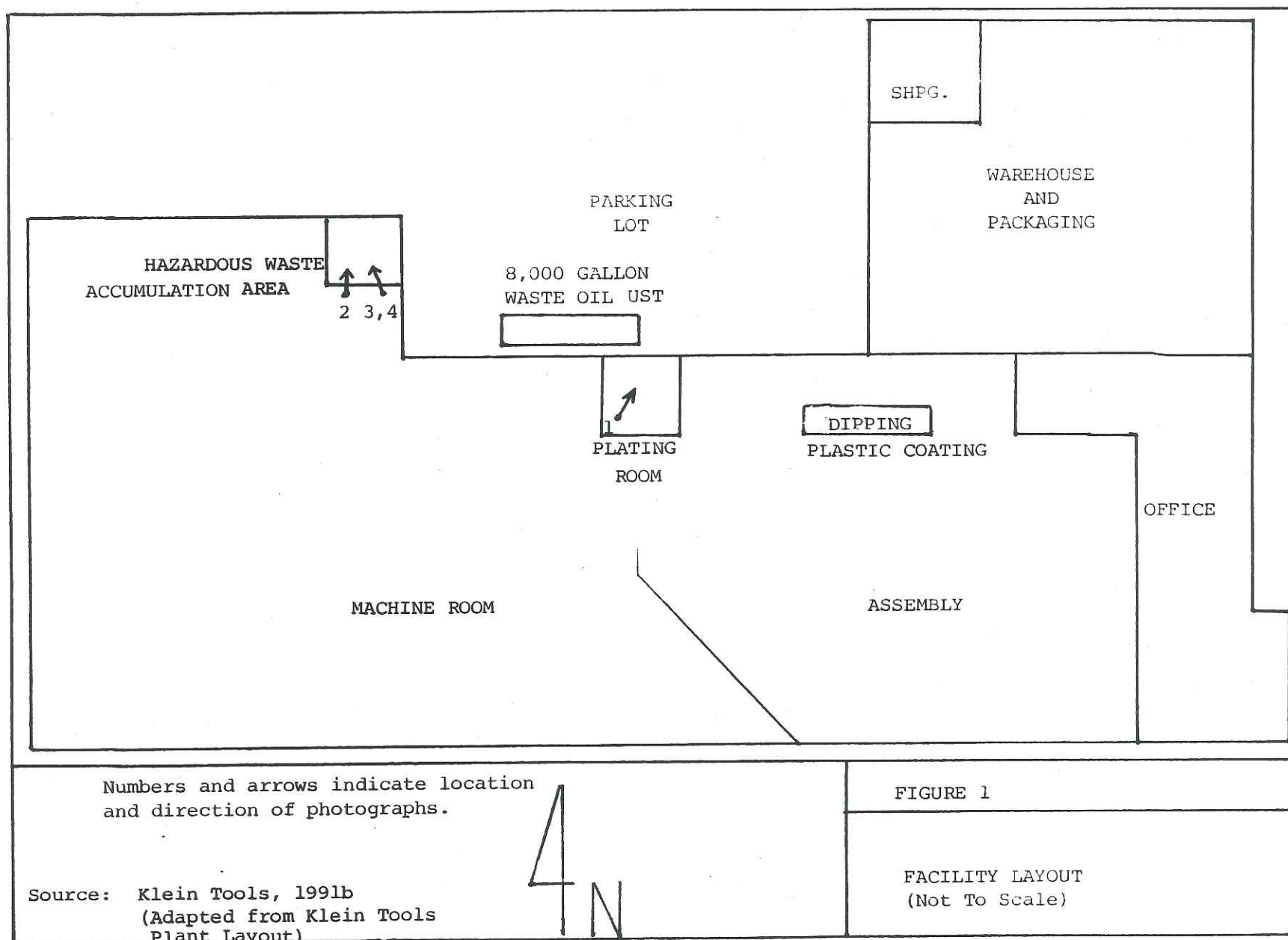
On January 29, 1987, Klein Tools filed a subsequent Notification as a small quantity generator of D002 and D007 wastes. IEPA and Federal files contained no information on any other inspections for RCRA compliance conducted at the facility.

3.0 WASTE STREAMS

Klein Tools currently generates six hazardous waste streams in three categories (D001, D002, and D007). These wastes include waste petroleum naphtha, waste compressed flammable gas, waste hydrochloric acid, waste zinc bath water, waste black oxide, and waste plating rinse water. The waste petroleum naphtha (D001) is generated from clean-up of parts in parts washers. This waste was sent to Safety Kleen in Arlington Heights, IL (ID# ILD000805929). Waste flammable gas (D001) was generated as a one-time waste stream when a quantity of Aerosol Systems Products (manufactured elsewhere and warehoused at Klein Tools for future sale) exceeded shelf life and was discarded. The waste gas was sent to Chemical Waste Management in Sauget, IL (ID# ILD098642424).

The remaining hazardous wastes are all generated in plating and finishing operations. Waste hydrochloric acid containing chromium (D002, D007) is generated during the cleaning of tool parts prior to plating, and is sent to Clean Harbors, Inc., in Chicago, IL (ID# ILD000608471). Waste zinc bath water (D002) is generated from the first stage of zinc/chrome plating. Waste black oxide rinse water (D002) is generated from black finishing operations. The D002 wastes are also sent to Clean Harbors in Chicago, IL. Waste plating rinse water containing chromium (D007) is generated from rinsing of tool parts after plating. This waste is sent to Clean Harbors in Chicago, IL and also to Clean Harbors in Braintree, MA (ID# MAD053452637). No cyanide is used in plating operations, and there is no wastewater treatment.

There are no satellite accumulation areas at Klein Tools. All plating related wastes are pumped directly from plating and rinse tanks into 55-gallon drums and transported directly to the hazardous waste accumulation area. The component liquids of the plating operation are continuously recirculated in the tanks until spent, then are replaced with fresh batches. All other wastes are also transported directly to the hazardous waste accumulation area upon generation.



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Klein Tools generates one nonhazardous stream, which is waste oil from machine lubrication. This waste is stored in an underground tank and is transported off-site by an oil-recycling contractor, Beaver Oil of Hodgkins, Illinois.

4.0 INSPECTION FINDINGS

The facility inspection consisted of an entrance meeting, records review, a facility walk-through, and interviews with facility personnel. Significant findings are detailed below.

4.1 RECORDS REVIEW

Dynamac reviewed the records of hazardous waste activities at the Klein Tools facility. The records review covered manifests, biennial reports, the contingency plan, personnel training records, and LDR notification forms. Dynamac noted the following problems with manifests, personnel files, and record keeping.

- Records of inspections of the hazardous waste accumulation area showed that these inspections were not conducted every week.
- Klein Tools did not have a written job description for employees responsible for handling hazardous wastes.
- Klein Tools' Contingency Plan does not describe actions facility personnel must take in the event of fires, explosions or releases, does not describe emergency equipment available, does not include an evacuation plan for facility personnel (with alternate routes), and does not describe the arrangements made with emergency response teams and with local hospitals.
- Klein Tools has not recently revised their Contingency Plan to reflect any changes in emergency coordinator, facility operations, emergency equipment, or applicable regulations.
- Klein Tools did not have documentation that their Contingency Plan had been sent to local authorities and state agencies.
- Klein Tools did not have a formalized written training program for personnel involved in the handling of hazardous wastes, and the program did not include use and maintenance of emergency equipment nor response to groundwater contamination incidents. A description of initial and continuing training was not included. There were no records to document that training had been completed. Record of former employees had not been kept at the facility for a period of three years.

4.2 FACILITY INSPECTION

The facility inspection covered plant production areas, the plating area, and the hazardous waste accumulation area. The majority of the facility floor is occupied by cutting and machining operations. Plating occurs in one small room near the center of the facility. The hazardous waste accumulation area is located in the northwest section of the building.

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The hazardous waste accumulation area is enclosed behind a fence with a locked gate. In case there are more drums than this area can hold, an adjacent fenced area is also used, as at the time of the inspection. The drums staged in this area are routinely marked with contents and accumulation dates. The following is a list of the hazardous wastes in this area at the time of the June 5, 1991, inspection:

Waste hydrochloric acid (D002) (D007) - 12 drums:

4 drums dated 3-22-91
4 drums dated 4-19-91
2 drums dated 5-21-91
2 drums dated 5-24-91

Waste black oxide rinse water (D002) - 3 drums:

3 drums dated 3-30-91

Waste zinc plating rinse water (D002) - 52 drums:

15 drums dated 3-23-91
14 drums dated 4-26-91
6 drums dated 4-27-91
17 drums dated 5-2-91

Unmarked drums - 1 drum

Mr. Serpe stated that the unmarked drum was zinc plating rinse water from the 3-23-91 batch. The last shipment of this waste was 3-7-91, less than 90 days prior to the 6-5-91 inspection.

There were no nonhazardous wastes stored in this area. The nonhazardous waste stream, waste oil, is stored in underground storage tanks prior to transport.

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5.0 INSPECTION SUMMARY AND REGULATORY DETERMINATIONS

Dynamac identified problems with the job descriptions, record keeping, and hazardous waste management during the inspection of the facility. The specific violations of the 35 IAC are noted below:

- 1) **722.134 (a).** The facility was accumulating hazardous waste in containers for less than 90 days without placing a date on one of the drums of hazardous zinc plating rinse water in the hazardous waste accumulation area, placing "Hazardous Waste" labels on the drums in the hazardous waste accumulation area, or complying with the following requirements:

- * **725.116 (a)(d)(e).** The job descriptions for employees responsible for handling hazardous waste were not complete in written form, nor did the facility have a written training program which included use and maintenance of emergency equipment and response to groundwater contamination incidents. A description of initial and continuing training was not included. There were no records to document that training had been completed. Records of former employees have not been kept for three years.
- * **725.137.** Klein Tools had not documented arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facilities.

- * **725.152 (a)(c)(e)(f).** The contingency plan does not describe actions facility personnel must take in the event of fires, explosions or releases. The contingency plan does not describe arrangements made with local hospitals and state and local emergency response teams. The contingency plan does not identify and describe all emergency equipment at the facility, with locations and capabilities. The contingency plan does not include an evacuation plan for facility personnel with alternate evacuation routes identified.
- * **725.153 (b).** The facility did not have documentation that they had submitted copies of the contingency plan to local hospitals, fire department, police, or emergency response teams.
- * **725.154 (a).** The contingency plan was not reviewed and amended to reflect changes in personnel, regulations or emergency equipment.
- * **725.274.** Inspections of hazardous waste accumulation area were not conducted weekly.

Dynamac also observed the following Land Disposal Restriction violation:

- 2) **728.150(a)** Not all drums were marked with accumulation start dates and labelled with the words "Hazardous Waste."

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REFERENCES

- IEPA, 1984 Letter to Klein Tools indicating that the facility was not regulated under 35 IAC 720-725 (May 22).
- Klein Tools, 1984 Letter to IEPA requesting deletion from hazardous waste facility list (May 25).
- Klein Tools, 1991 Generator 1990 Annual Hazardous Waste Report Form. Submitted by Michael Serpe, Klein Tools Industrial Engineer (Feb. 26).

APPENDIX A
INSPECTION CHECKLISTS

A-1 RCRA INSPECTION REPORT

A-2 PRE-INSPECTION FILE REVIEW FORM

A-3 RCRA GENERATOR CHECKLIST

A-4 RCRA LAND DISPOSAL RESTRICTION INSPECTION CHECKLIST

A-1 RCRA INSPECTION REPORT

RCRA INSPECTION REPORT

TYPE OF FACILITY**TYPE OF INSPECTION**

NON-REGULATED STATUS

PART A

PART B PERMIT APPLICATION

ENFORCEMENT

ORDERS ISSUED

TSD FACILITY ACTIVITY SUMMARY NA[illegible]

OWNER

OPERATOR

Name	Klein Tools	Name	Same as owner
Address	7200 N McCormick Rd	Address	
City	Chicago	City	
State	IL	State	
Zip	60645	Zip	
Phone #	(708) 677-9500	Phone #	

PERSON(S) INTERVIEWED

TITLE**PHONE #**

Michael Serpe	Industrial Engineer	(708) 677-9500

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

Russ Crittenden	IEPA / Dynamac	(312) 466-0222
Darline Terrell	IEPA / Dynamac	(312) 466-0222
Jeffrey Smith	IEPA / Dynamac	(312) 466-0222

PREPARED BY

AGENCY/TITLE**PHONE #**

Russ Christensen	IEPA / Dynamac	(312) 466-0222
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SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section
OTH	1	722.134 (a)
		(725.116 (a))
		(725.116 (d))
		(725.116 (e))
		(725.137)
		(725.152 (a))
		(725.152 (c))
		(725.152 (e))
		(725.152 (f))
		(725.153)
		(725.154)
		(725.274)
LDR	1	728.150 (a)

[illegible][illegible]

Facility Name: Klein Tools

USEPA #: IL 0005149141

IEPA #: 0316005491

WASTE DISPOSITION FORM

On Annual
Report for:
(Circle if present;
cross out if not present)

Waste Name (include haz &
waste for which no determination
has been made)

Generating Process (For waste
gen. on site. N/A for TSD)

Date of Last Analysis

USEPA Haz Waste #

• On 8700-12

• On 3510-3

• 19 88

• 19 89

• 19 90

Amount on Site

Rate of Generation

Last Manifested Shipment

Disposition

Waste Hydrochloric Acid	Pre-plating cleaning	10/9/90	D002 D007	Y	N/A	G	F	G	F	F	660 gal	508 gal/mo	3/7/91	Clean Harbors Baltimore, Md
Alkaline Zinc Rinse Water	Plating rinse	10/9/90	D002	Y	"	G	F	G	F	F	2660 gal	100 gal/mo	3/7/91	"
Zinc Bath	Plating	10/9/90	D002	Y	"	G	F	G	F	F	0 gal	14 gal/mo	3/7/91	"
Black Oxide rinse water	Black oxide finishing rinse	10/9/90	D002	Y	"	G	F	G	F	F	165 gal	96 gal/mo	3/7/91	"
Waste petroleum naphth	Parts cleaning	10/9/90	D001	No	"	G	F	G	F	F	0 gal	6.5 gal/mo	3/8/91	Safety Kleen Arlington Heights, IL
Waste flammable gas	Expired product intended for sale	N/A	D001	No	"	G	F	G	F	F	0 gal	1412 gal/yr.	3/9/90	Chemical Waste Management Siouxport, IL
						G	F	G	F	F				
						G	F	G	F	F				
						G	F	G	F	F				
						G	F	G	F	F				
						G	F	G	F	F				

* All "NO" responses must be explained in narrative

A-2 PRE-INSPECTION FILE REVIEW FORM

PRE-INSPECTION FILE REVIEW FORM

Facility Name: Klein Tools, Inc.

Location: 7200 McCormick Rd Chicago IL 60645

ID#: ILD 005 149 141

Activity: Small Q Generator

Last Inspection
if applicable: 4-13-84

Past Violations: None

A-3 RCRA GENERATOR CHECKLIST

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1				Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

GEN-A-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements	<input checked="" type="checkbox"/>			
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				Transporter never unable to deliver waste.

GEN-B-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			Section 722.121: Acquisition of Manifests a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? or For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
MAN	2			Section 722.122: Number of Copies Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2			Section 722.123: Use of the Manifest For each manifest received, has the generator: <ol style="list-style-type: none"> 1) Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

GEN-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No	
			Sub Sec		Yes	No			
OTH	1	X		PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements					
				Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓		
				Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓		Containers not ready for transport
				Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____ b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____			✓		Containers not ready for transport

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			V	Transporter supplies placards
OTH	1	X			Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.	2/			Page C-2(a) deleted Facility is not a TSD.

GEN-C-3

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>Special Requirements for Ignitable or Reactive Wastes (Section 725.275)</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Special Requirements for Incompatible Wastes (Section 725.277)</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				<p>No waste in tanks Pages C-5 thru C-13 deleted.</p>

GEN-C-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes ___ No <input checked="" type="checkbox"/> N/A ___</p>				<p>One drum unmarked Mr. Sipe stated that it was from 3-23-91 zinc plating rinse batch</p>
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes ___ No <input checked="" type="checkbox"/></p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below:</p> <p>Maintenance and Operation of Facility (Section 725.131)</p> <p>Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:</p> <ul style="list-style-type: none"> - Air; - Soil; or - Surface Water, <p>which would threaten human health or the environment?</p> <p>Yes <input checked="" type="checkbox"/> No ___</p>				

GEN-C-14

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Required Equipment (Section 725.132)</p> <p>Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:</p> <ul style="list-style-type: none"> - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answers must be explained in the Remarks column.</p>				

GEN-C-15

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					Testing and Maintenance of Equipment (Section 725.133) Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency: - Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <u>NOTE:</u> Any "N/A" answer must be explained in the Comments. Access to Communications or Alarm Systems (Section 725.134) Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 735.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				

GEN-C-16

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Required Aisle Space (Section 725.135)</p> <p>Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Document non-compliance with photograph.</p> <p>Arrangements with Local Authorities (Section 725.137)</p> <p>Has the owner or operator made or attempted to make the following arrangements, as appropriate for the type of waste handled at this facility and the potential need for the services of these organizations:</p> <p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-C-17

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart D: Contingency Plan and Emergency Procedures listed below:</p> <p>Purpose and Implementation of Contingency Plan (Section 725.151)</p> <p>Is a plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: If answer is "No", skip to Emergency Coordinator (Section 725.155).</p>				<p>Not Documented</p> <p>Currently undergoing revision.</p>

GEN-C-18

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Content of Contingency Plan (Section 725.152)</p> <p>Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:</p> <p>1) Fires? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>2) Explosions? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>3) Contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) State and local emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>				

GEN-C-19

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If more than one person is designated as an emergency coordinator, is a primary coordinator identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the plan identify:</p> <ol style="list-style-type: none"> 1) A list and physical description of all emergency equipment at the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 2) A brief outline of the capability of each piece of emergency equipment? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 3) The location of each piece of emergency equipment? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <p>Is the list of emergency equipment up-to-date? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>				

GEN-C-20

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Are alternate evacuation routes identified? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Copies of Contingency Plan (Section 725.153)</p> <p>Has a copy (and all revisions) of the contingency plan:</p> <p>a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Amendment of Contingency Plan (Section 725.154)</p> <p>Has the contingency plan been reviewed and, if necessary, amended whenever:</p> <p>1) Applicable regulations are revised? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-C-21

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes in the response necessary in an emergency? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>4) The list of emergency coordinators changes? Yes ____ No <input checked="" type="checkbox"/></p> <p>5) The list of emergency equipment changes? Yes ____ No <input checked="" type="checkbox"/></p> <p>Emergency Coordinator (Section 725.155)</p> <p>Is there an emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No ____</p> <p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes <input checked="" type="checkbox"/> No ____</p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes <input checked="" type="checkbox"/> No ____</p>				

GEN-C-22

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Emergency Procedures (Section 725.156)</p> <p>Has the facility had a release, fire or explosion? Yes ____ No <input checked="" type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures prescribed in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column of 722.134.</p> <p>a4 Has the generator complied with the requirements of 35 Ill. Adm. Code 725.116: Personnel Training listed below:</p> <p>Personnel Training (Section 725.116)</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No ____</p> <p>NOTE: If "No", skip to Subsection (c)1 page GEN-C-26.</p> <p>Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No ____</p> <p>Is the training program formalized, i.e., written down? Yes ____ No <input checked="" type="checkbox"/></p> <p>Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No ____</p>				

GEN-C-23

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the program cover, at a minimum:</p> <p>1) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>2) Key parameters for automatic waste feed cut-off systems? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No _____</p> <p>4) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No _____</p> <p>5) Response to groundwater contamination incidents? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No _____</p> <p>Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Has the facility conducted an annual review of the initial training? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>				Not documented

GEN-C-24

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes _____ No <input checked="" type="checkbox"/></p> <p>2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes _____ No <input checked="" type="checkbox"/></p> <p>3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes _____ No <input checked="" type="checkbox"/></p> <p>4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes _____ No <input checked="" type="checkbox"/></p> <p>Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>				
								No Satellite accumulation

GEN-C-25

Pages C-26 & C-27 deleted

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No	
			Ltr	Sub Sec		Yes	No			
OTH	2				PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the generator retained for a period of three years:	✓				
					a					- A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
					b					- A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
					b					- A copy of each exception report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
					c					- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
					d					Does a generator who is involved in any unresolved en- forcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>									

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p>Section 722.141: Annual Reporting</p> <p>Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?</p> <p>NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.</p>	✓			
MAN	1			<p>Section 722.142: Exception Reporting</p> <p>a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes _____ No _____</p> <p>b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes _____ No _____</p> <p>b Does any exception report submitted to the Director contain the following:</p> <ul style="list-style-type: none"> - A legible copy of the manifest for which the generator does not have confirmation of delivery; and 			✓	

No additional reporting.
Facility does not export or import wastes, and is not a farmer. Pages D-3, E-1, F-1 and G-1 deleted.

GEN-D-2

A-4 RCRA LAND DISPOSAL RESTRICTIONS CHECKLIST

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Klein Tools
 U.S. EPA ID No.: ILD 005 149141
 Street: 7200 N McCormick Blvd
 City: Chicago State: IL Zip: 60645
 Telephone: (708) 677-9500

Inspection Date: 6/5/91 Time: 910 (am/pm)

Weather Conditions: ~65°, sunny

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>Ross Crittenden</u>	<u>IEPA / Dynamac</u>	<u>(312) 466-0222</u>
	<u>Darlene Terrell / Jeff Smith</u>	<u>IEPA / Dynamac</u>	<u>(312) 466-0222</u>
Facility Representatives:	<u>Michael Serper, Industrial Engineer</u>		

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	_____	_____	_____	_____	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List*	<u>✓</u>	_____	_____	_____	_____
First Third [40 CFR 268.10]	_____	_____	_____	_____	_____
Second Third [40 CFR 268.11]	_____	_____	_____	_____	_____
Third Third [40 CFR 268.12]	<u>✓</u>	_____	_____	_____	_____

* See Appendix A

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:

2. F020-F023 and F026-F028 dioxin-containing wastes:

3. California List Wastes (See Appendix A):

D002 (pH \leq 2.0)

4. First Third Wastes [40 CFR 268.10]:

5. Second Third Wastes [40 CFR 268.11]:

6. Third Third Wastes [40 CFR 268.12]**:

D001, D002, D007

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes ☒ No ☐

If no, list below:

Assigned ClassificationCorrect Classification

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments:

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☐ No ☐ NA ☒

Comments No listed wastes

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]
 Yes ☐ No ☒ List _____
7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]
 Yes ☐ No ☒ List _____
11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]
 Yes ☐ No ☒ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ___ No ___ NA ☒

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCME. (40 CFR 268.2(f)(1))

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ☒

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. (40 CFR 268.2(f))

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ___ NA ___

If available, list each waste code and check the correct treatability group:

<u>Waste Code</u>	<u>Subcategory</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
0001	_____	_____	✓
0002	_____	_____	✓
0007	_____	_____	✓

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. (40 CFR 268.2(f)(2) and (3))

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ✓ No NA

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes No NA ✓

*Use of the alternative treatment standards is not required. (55 FR 22629)

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

— Organometallics: 40 Part 268, Appendix IV constituents

Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. (55 FR 22629)

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes No NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. **California List Wastes:** Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm**

Yes No NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs

≥500 ppm PCBs

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes _____ No _____ NA ☒

If yes, check the appropriate treatability group:

- Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
- All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or > 130 mg/l thallium

Yes ☐ No ☐ NA ☒

5. **National Capacity Variance Wastes:** If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes No NA ☒

If California List prohibitions apply, complete the following table for each waste code, noting the date on which the national capacity variance expires.

<u>Waste Code</u>	<u>Cal List Applicability</u>	<u>Expiration Date</u>
_____	_____	____/____/____
_____	_____	____/____/____
_____	_____	____/____/____

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☐ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes _____ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☐ No ☐

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☐ No ☐ (Go to 3.)

Comments _____

2. Which of the following methods does the generator use to make this determination (more than one may apply)?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

pool - flammable gas (expired product intended for sale)

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?*** (BDAT*** = stabilization/immobilization technology)

Yes ☒ No ☐ NA ☐

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

DOOL, DOO7

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ☐ No ☐ NA ☒

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☐ NA ☒

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☐

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ☐ No ☐ NA ☐

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ☐ No ☒

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

<u>Waste Code</u>	<u>Receiving Facility</u>
<u>P002</u>	<u>Clean Harbors, Baltimore MD</u>
<u>P007</u>	<u>"</u>
<u>P001</u>	<u>Safety Klean, Arlington Heights, IL</u>

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☒ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [268.7(a)(3)]

Yes _____ No _____

b. Is a notification sent with each waste shipment?

Yes No

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes _____ No _____ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
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000001	
000002	
000003	
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Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement?
[40 CFR 268.7(a)(9)]

Yes _____ No _____

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes No NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes No NA ✓

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes No

Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes No NA

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

This image shows a full page of a document template consisting of approximately 20 evenly spaced horizontal black lines on a white background. The lines are uniform in thickness and extend across the entire width of the page, providing a guide for writing or drawing. There are no margins, headers, footers, or other markings present.



WASTE MATERIAL PROFILE SHEET RECERTIFICATION ADDENDUM

 4742
 PROFILE NUMBER

A. GENERAL INFORMATION

GENERATOR KLEIN TOOLS BILL TO: SAME
 (As will appear on manifest) (Customer)
 FACILITY ADDRESS 3200 N. McCormick Blvd CUSTOMER CONTACT Michael Serpe
Skokie IL 60076 CUSTOMER PHONE (773) 477-9500 Ex 425
 TECHNICAL CONTACT Michael Serpe GENERATOR U.S. EPA ID # ILD1010511419111
 GENERATORS COMMON NAME FOR WASTE Black Oxide Rinse Water GENERATOR STATE ID # 03161005419111
 PROCESS GENERATING WASTE Patina
☐ WASTE WATER ☐ NON-WASTE WATER (Total suspended solids > 1% and total organic Carbon > 1%)

EFFECTIVE 9/25/90 - LIST OF TOXIC CHARACTERISTIC WASTES

WASTE CODE #	CONTAMINATION	REGULATORY LEVEL (mg/L)	BELOW	CONCENTRATION (mg/l) ABOVE	SPECIFIC IF KNOWN
D004	Arsenic	5.0	/		
D005	Barium	100.0	/		
D018	Benzene	0.5	/		
D006	Cadmium	1.0	/		
D019	Carbon tetrachloride	0.5	/		
D020	Chlordane	0.03	/		
D021	Chlorobenzene	100.0	/		
D022	Chloroform	6.0	/		
D007	Chromium	5.0	/		
D023	o-Cresol	200.0 ³	/		
D024	m-Cresol	200.0 ³	/		
D025	p-Cresol	200.0 ³	/		
D026	Cresol	200.0 ³	/		
D016	2, 4-D	10.0	/		
D007	1, 4-Dichlorobenzene	7.5	/		
D029	1, 2-Dichloroethane	0.5	/		
D030	1, 1-Dichloroethylene	0.7	/		
D012	2, 4-Dinitrotoluene	0.03 ²	/		
D013	Endrin	0.02	/		
D032	Heptachlor (and it's hydroxide)	0.008	/		
D033	Hexachlorobenzene	0.13 ²	/		
D034	Hexachlorobutadiene	0.5	/		
D008	Hexachloroethane	3.0	/		
D013	Lead	5.0	/		
D009	Lindane	0.4	/		
D014	Mercury	0.2	/		
D035	Methoxychlor	10.0	/		
D036	Methyl ethyl ketone	200.0	/		
D037	Nitrobenzene	2.0	/		
D038	Pentachlorophenol	100.0	/		
D010	Pyridine	5.0 ²	/		
D011	Selenium	1.0	/		
D039	Silver	5.0	/		
D015	Tetrachloroethylene	0.7	/		
D040	Toxaphene	0.5	/		
D041	Trichloroethylene	0.5	/		
D042	2, 4, 5-Trichlorophenol	400.0	/		
D043	2, 4, 6-Trichlorophenol	2.0	/		
D044	2, 4, 5-TP (Silvex)	1.0	/		
D045	Vinyl chloride	0.2	/		

- Hazardous Waste number.
- Quantitation limit is greater than the calculated regulatory level.
- If o-, m-, and p-Cresol concentrations can't be differentiated, the total cresol (D024) concentration is used. The regulatory level of total cresol is 200 mg/l.
- Concentration is determined by toxicity characteristic leaching procedure (TCLP)

Completed by generator's detailed knowledge of waste or process generating waste? YES ☒ NO ☐
 P Analysis Completed? YES ☐ NO ☒ (Please attach)

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I certify that the waste is not radioactive, pyrophoric, explosive or shock sensitive. I also certify that any samples submitted are representative of the actual waste.

Michael Serpe
 AUTHORIZED SIGNATURE

Michael Serpe
 NAME (PRINT)

11/12/90
 DATE



WASTE MATERIAL PROFILE SHEET RECERTIFICATION ADDENDUM

 4947
 PROFILE NUMBER

A. GENERAL INFORMATION

C. GENERATOR KLEEN TOOLSBILL TO: SAME
 (As will appear on manifest)
 FACILITY ADDRESS 2200 N. McCormick Blvd
Skokie IL 60076

 (Customer)
 CUSTOMER CONTACT Michael Serpe
 CUSTOMER PHONE (708) 477-9500 Ex 425
 GENERATOR U.S. EPA ID # ILD101015114911411
 GENERATOR STATE ID # 013161001549111
TECHNICAL CONTACT Michael SerpeGENERATORS COMMON NAME FOR WASTE WastePROCESS GENERATING WASTE Plating☐ WASTE WATER☐ NON-WASTE WATER (Total suspended solids > 1% and total organic Carbon > 1%)

EFFECTIVE 9/25/90 - LIST OF TOXIC CHARACTERISTIC WASTES

WASTE CODE #	CONTAMINATION	REGULATORY LEVEL (mg/L)	BELOW	CONCENTRATION (mg/l) ABOVE	SPECIFIC IF KNOWN
D004	Arsenic	5.0	/		
D005	Barium	100.0	/		
D013	Benzene	0.5	/		
D006	Cadmium	1.0	/		
D019	Carbon tetrachloride	0.5	/		
D020	Chloroform	0.03	/		
D021	Chlorobenzene	100.0	/		
D022	Chloroform	6.0	/		
D007	Chromium	5.0	/		
D023	o-Cresol	200.0 ³	/		
D024	m-Cresol	200.0 ³	/		
D025	p-Cresol	200.0 ³	/		
D026	Cresol	200.0 ³	/		
D016	2, 4-D	10.0	/		
D001	1, 4-Dichlorobenzene	7.5	/		
D002	1, 2-Dichloroethane	0.5	/		
D029	1, 1-Dichloroethylene	0.7	/		
D030	2, 4-Dinitrotoluene	0.03 ²	/		
D012	Endrin	0.02	/		
D013	Heptachlor (and it's hydroxide)	0.008	/		
D032	Hexachlorocyclopentadiene	0.13 ²	/		
D033	Hexachlorobutadiene	0.5	/		
D034	Hexachloroethane	3.0	/		
D008	Lead	5.0	/		
D013	Lindane	0.4	/		
D009	Mercury	0.2	/		
D014	Methoxychlor	10.0	/		
D035	Methyl ethyl ketone	200.0	/		
D036	Nitrobenzene	2.0	/		
D037	Pentachlorophenol	100.0	/		
D038	Pyridine	5.0 ²	/		
D010	Selenium	1.0	/		
D011	Silver	5.0	/		
D039	Tetrachloroethylene	0.7	/		
D015	Toxaphene	0.5	/		
D040	Trichloroethylene	0.5	/		
D041	2, 4, 5-Trichlorophenol	400.0	/		
D041	2, 4, 6-Trichlorophenol	2.0	/		
D042	2, 4, 5-TP (Silvex)	1.0	/		
D043	Vinyl chloride	0.2	/		

1. Hazardous Waste number.

2. Quantitation limit is greater than the calculated regulatory level.

3. If o-, m-, and p-Cresol concentrations can't be differentiated, the total cresol (D024) concentration is used. The regulatory level of total cresol is 200 mg/l.

4. Concentration is determined by toxicity characteristic leaching procedure (TCLP)

• Completed by generator's detailed knowledge waste or process generating waste? YES ☐ NO ☒• Analysis Completed? YES ☒ NO ☐ (Please attach)

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I certify that the waste is not radioactive, pyrophoric, explosive or shock sensitive. I also certify that any samples submitted are representative of the actual waste.

Michael Serpe
 CHI 102 AUTHORIZED SIGNATURE

Michael Serpe
 NAME/PRINT

11/12/90
 DATE



**ENVIRONMENTAL
MONITORING AND
TECHNOLOGIES, INC.**

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
708/967-6666

LABORATORY REPORT

10771

Klein Tools
7200 North McCormick
Chicago, IL 60645

Report Date: 10/9/90
Sample Received: 9/25/90

Sample Description: Hydrochloric Acid

Analysis performed on extract from TCLP

Sample # 6639

Arsenic	<0.01
Barium	2.06
Cadmium	0.08
Chromium	170.
Lead	3.95
Mercury	0.01
Selenium	<0.01
Silver	<0.01

All results expressed as ppm unless otherwise indicated.

Methods performed according to SW-846, "Test Methods for Evaluating Solid Waste".

Karen Matchett

LABORATORY DIRECTOR

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
708/967-6666
FAX: 708/967-6735

LABORATORY REPORT

03320

Klein Tools, Inc.
7200 North McCormick
Chicago, IL 60645

Report Date: 10/3/90
Sample Received: 9/25/90

Sample Description: Hydrochloric Acid

Sample No.: 6639

Concentration

Method Detection

Found IN

Waste dependent

Regulatory

Compounds	Sample	Blank	Limit (MDL)	Limit
1. Benzene	<0.25	0.10	0.10	0.50
2. Carbon Tetrachloride	<0.25	0.10	0.10	0.50
3. Chlorobenzene	<50.0	0.10	0.10	100.00
4. Chloroform	<3.0	0.10	0.10	6.00
5. o-Cresol	<100.00	0.10	0.10	200.00
6. m-Cresol	<100.00	0.10	0.10	200.00
7. p-Cresol	<100.00	0.10	0.10	200.00
Total Cresol	<100.00	0.10	0.10	200.00
8. 1,4-Dichlorobenzene	<3.75	0.10	0.10	7.50
9. 1,2-Dichloroethane	<0.25	0.10	0.10	0.50
10. 1,1-Dichloroethene	<0.35	0.10	0.10	0.700
11. 2,4-Dinitrotoluene	<0.07	0.05	0.05	0.13
12. Hexachlorobenzene	<0.07	0.05	0.05	0.13
13. Hexachloro-1,3-butadiene	<0.25	0.10	0.10	0.50
14. Hexachloroethane	<1.50	0.10	0.10	3.00
15. Methyl ethyl Ketone	<100.00	0.10	0.10	200.00
16. Nitrobenzene	<1.00	0.10	0.10	2.00
17. Pentachlorophenol	<50.00	0.10	0.10	100.00
18. Pyridine	<2.50	0.10	0.10	5.00
19. Tetrachloroethylene	<0.35	0.10	0.10	0.70
20. Trichloroethylene	<0.25	0.10	0.10	0.50
21. 2,4,5-Trichlorophenol	<200.00	0.10	0.10	400.00
22. 2,4,6-Trichlorophenol	<1.00	0.10	0.10	2.00
23. Vinyl Chloride	<0.10	0.10	0.10	0.20

All results expressed as ppm unless otherwise indicated.

Methods performed according to SW-846, "Test Methods for Evaluating Solid Waste".

Analysis performed on Extract from TCLP.

Leah E. Zehner

LABORATORY DIRECTOR



WASTE MATERIAL PROFILE SHEET RECERTIFICATION ADDENDUM

4551

PROFILE NUMBER

GENERAL INFORMATION

GENERATOR KLEIN TOOLSBILL TO: SAME

(As will appear on manifest)

FACILITY ADDRESS 2200 N. McCormick Blvd
SKOKIE IL 60076

(Customer)

CUSTOMER CONTACT Michael SerpeCUSTOMER PHONE (312) 677-9500 Ext 425GENERATOR U.S. EPA ID # ILD10101514911411GENERATOR STATE ID # 03116100549111TECHNICAL CONTACT Michael SerpeGENERATORS COMMON NAME FOR WASTE Fire BathPROCESS GENERATING WASTE Painting☐ WASTE WATER☐ NON-WASTE WATER (Total suspended solids >1% and total organic Carbon >1%)

EFFECTIVE 9/25/90 - LIST OF TOXIC CHARACTERISTIC WASTES

WASTE CODE #	CONTAMINATION	REGULATORY LEVEL (mg/L)	BELOW	ABOVE	*CONCENTRATION (mg/l) SPECIFIC IF KNOWN
D004	Arsenic	5.0	/		
D005	Barium	100.0	/		
D019	Benzene	0.5	/		
D006	Cadmium	1.0	/		
D019	Carbon tetrachloride	0.5	/		
D020	Chlordane	0.03	/		
D021	Chlorobenzene	100.0	/		
D022	Chloroform	6.0	/		
D007	Chromium	5.0	/		
D023	o-Cresol	200.0 ³	/		
D024	m-Cresol	200.0 ³	/		
D025	p-Cresol	200.0 ³	/		
D026	Cresol	200.0 ³	/		
D016	2, 4-D	10.0	/		
C	1, 4-Dichlorobenzene	7.5	/		
C	1, 2-Dichloroethane	0.5	/		
D029	1, 1-Dichloroethylene	0.7	/		
D030	2, 4-Dinitrotoluene	0.03 ²	/		
D012	Endrin	0.02	/		
D013	Heptachlor (and it's hydroxide)	0.008	/		
D032	Hexachlorobenzene	0.13 ²	/		
D033	Hexachlorocyclopentadiene	0.5	/		
D034	Hexachloroethane	3.0	/		
D008	Lead	5.0	/		
D013	Lindane	0.4	/		
D009	Mercury	0.2	/		
D014	Methoxychlor	10.0	/		
D035	Methyl ethyl ketone	200.0	/		
D036	Nitrobenzene	2.0	/		
D037	Pentachlorophenol	100.0	/		
D038	Pyridine	5.0 ²	/		
D010	Selenium	1.0	/		
D011	Silver	5.0	/		
D039	Tetrachloroethylene	0.7	/		
D015	Toxaphene	0.5	/		
D040	Trichloroethylene	0.5	/		
D041	2, 4, 5-Trichlorophenol	400.0	/		
D041	2, 4, 6-Trichlorophenol	2.0	/		
D042	2, 4, 5-TP (Silvex)	1.0	/		
D043	Vinyl chloride	0.2	/		

1. Hazardous Waste number.

2. Quantitation limit is greater than the calculated regulatory level.

3. If o-, m-, and p-Cresol concentrations can't be differentiated, the total cresol (D024) concentration is used. The regulatory level of total cresol is 200 mg/l.

4. Concentration is determined by toxicity characteristic leaching procedure (TCLP)

• Completed by generator's detailed knowledge of waste or process generating waste? YES ☐ NO ☒• P Analysis Completed? YES ☒ NO ☐ (Please attach)

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I certify that the waste is not radioactive, pyrophoric, explosive or shock sensitive. I also certify that any samples submitted are representative of the actual waste.

Michael Serpe
AUTHORIZED SIGNATURE

Michael Serpe

11/12/90



ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
708/967-6666

LABORATORY REPORT

03772

Klein Tools
7200 North McCormick
Chicago, IL 60645

Report Date: 10/9/90
Sample Received: 9/25/90

Sample Description: Alkaline Zinc Bath

Analysis performed on extract from TCLP

Sample # 6640

Arsenic	1.2
Barium	1.0
Cadmium	0.2
Chromium	18.
Lead	1.2
Mercury	<0.01
Selenium	0.20
Silver	0.20

All results expressed as ppm unless otherwise indicated.

Methods performed according to SW-846, "Test Methods for Evaluating Solid Waste".

Karen Matchett

LABORATORY DIRECTOR

MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
708/967-6666

LABORATORY REPORT

03772-A

Plain Tools
7200 North McCormick
Chicago, IL 60645

Report Date: 10/9/90
Sample Received: 9/25/90

Sample Description: Alkaline Zinc Bath

Sample No.: 6640	Concentration		Method Detection	
	Found IN		Waste Dependent	Regulatory
Compounds	Sample	Blank	Limit (MDL)	Limit
1. Benzene	<0.25	0.10	0.10	0.50
2. Carbon Tetrachloride	<0.25	0.10	0.10	0.50
3. Chlorobenzene	<50.0	0.10	0.10	100.00
4. Chloroform	<3.0	0.10	0.10	6.00
5. o-Cresol	<100.00	0.10	0.10	200.00
6. m-Cresol	<100.00	0.10	0.10	200.00
7. p-Cresol	<100.00	0.10	0.10	200.00
Total Cresol	<100.00	0.10	0.10	200.00
8. 1,4-Dichlorobenzene	<3.75	0.10	0.10	7.50
9. 1,2-Dichloroethane	<0.25	0.10	0.10	0.50
10. 1,1-Dichloroethene	<0.35	0.10	0.10	0.700
11. 2,4-Dinitrotoluene	<0.10	0.05	0.05	0.13
12. Hexachlorobenzene	<0.10	0.05	0.05	0.13
13. Hexachloro-1,3-butadiene	<0.25	0.10	0.10	0.50
14. Hexachloroethane	<1.50	0.10	0.10	3.00
15. Methyl Ethyl Ketone	<100.00	0.10	0.10	200.00
16. Nitrobenzene	<1.00	0.10	0.10	2.00
17. Pentachlorophenol	<50.00	0.10	0.10	100.00
18. Pyridine	<2.50	0.10	0.10	5.00
19. Tetrachloroethylene	<0.35	0.10	0.10	0.70
20. Trichloroethylene	<0.25	0.10	0.10	0.50
21. 2,4,5-Trichlorophenol	<200.00	0.10	0.10	400.00
22. 2,4,6-Trichlorophenol	<1.00	0.10	0.10	2.00
23. Vinyl Chloride	<0.10	0.10	0.10	0.20

All results expressed as ppm unless otherwise indicated.

Methods performed according to SW-846, "Test Methods for Evaluating Solid Waste".

Analysis performed on Extract from TCLP.

Leah E. Zehner

LABORATORY DIRECTOR

PRC Environmental Management, Inc.
233 N. Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



August 8, 1991

Ms. Barbara Russell
RCRA Enforcement Branch (5HR-12)
U.S. EPA Region 5
230 South Dearborn Street, 12th Floor
Chicago, IL 60604

**Re: EPA Contract No. 68-W9-0006
Work Assignment No. R05031
Submittal of Compliance Evaluation Inspection (CEI) Final Report**

Dear Ms. Russell:

PRC Environmental Management, Inc. (PRC), is submitting one copy of the Final CEI Report for the Klein Tools, Inc. facility (ILD 005 149 141) in Chicago, Illinois. PRC has sent two copies of this Final Report containing the original photographs to the Illinois Environmental Protection Agency (IEPA).

If you have any questions or comments on this report, please contact me at 312/856-8700.

Sincerely,

Rick Hersemann
Project Manager

Enclosure

cc: Fred Norling, EPA RPO (letter only)
Clifford Gould, IEPA (two original copies of Final Report)
Ed Schuessler, PRC (letter only)
Joe Weslock, Dynamac (letter only)

PRC Environmental Management, Inc.
233 N. Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



August 8, 1991

Mr. Clifford Gould - Maywood Regional Manager
Field Operation Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, IL 60153

Re: EPA Contract No. 68-W9-0006
Work Assignment No. R05031
Submittal of Compliance Evaluation Inspection (CEI) Final Report

Dear Mr. Gould:

PRC Environmental Management, Inc. (PRC), is submitting two copies of the Final CEI Report for the Klein Tools, Inc. facility (ILD 005 149 141) in Chicago, Illinois. These copies include the original photographs. PRC is also submitting two copies of Attachment A for the Compliance Inquiry Letter (CIL).

If you have any questions or comments on this report, please contact me at 312/856-8700.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Hersemann". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rick Hersemann
Project Manager

Enclosures (2)

cc: Fred Norling, EPA RPO (letter only)
Ed Schuessler, PRC (letter only)
Barbara Russell, U.S. EPA Region 5
Joe Weslock, Dynamac (letter only)

ATTACHMENT A

Klein Tools
U.S.EPA ID # ILD 005 149 141
IEPA ID # 0316005491

1. !31! 1, 2, 3, and 4 (Use Variable Paragraph beginning with: Specifically,...)
 - a. !222! Your logs of inspection of satellite and container accumulation areas indicate that inspections were not conducted weekly.
 - b. !75! 2 and 3
 - c. !84! Your facility has not familiarized local hospitals with the properties of the hazardous wastes you handle.
 - d. !86! Your Contingency Plan does not describe actions to be taken by personnel in the in event of a fire, explosion or release.
 - e. !88! Your Contingency Plan does not describe the arrangements made with fire and police departments, local hospitals, and state and local emergency response teams.
 - f. !90! Your Contingency Plan does not include a list of emergency equipment, together with their locations and capabilities.
 - g. !91! Your Contingency Plan does not include an evacuation plan.
 - h. !92! b
 - i. !93! a, d, and e

Document # 2896n

2. !43! A